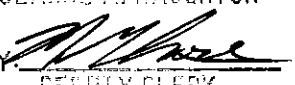


Submitted by
Larry Kushner
Debtor pro-se
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(732) 670-6703

Jacqueline Kushner
Debtor pro se
Mom.kush@gmail.com
(732) 670-4277

U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ

2019 SEP 24 A 10:56

JENNIFER A. HAUGHTON
BY 
DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

402 East Trenton Street
Trenton, NJ 08608

IN RE: LARRY J. KUSHNER and
JACQUELINE KUSHNER
731 GREENS AVE
LONG BRANCH, NJ 07740

CASE NO. 18-33285-CMG
CHAPTER 13
Judge Christine M. Gravelle

Soc. Sec. No. xxx-xx-5977
Soc. Sec No. xxx-xx-5868

DEBTOR'S DECLARATION IN OPPOSITION TO STAY RELIEF

Larry J. Kushner, debtor being duly sworn does hereby declare:

1. I am a co debtor in this proceeding.
2. I make this declaration in opposition to the alleged creditor specialized loan serving's instant motion to lift the stay in this matter.
3. At the outset I oppose this motion on procedural grounds. They are:
 - a. My attorney in this matter is Vivian sobers, who was admitted pro hoc vice in this matter on July 26, 2019, yet

- the service of this motion on 8/28/18 was NOT made on her. Thus, this motion must be denied.
- b. The movant does not attach to this motion any valuation for this property, as required.
 - c. The movant in their proof of claim states that they "lost the note" that this claim is based upon. Yet, they attach an alleged copy. That is clearly deceitful to this Court and should not be allowed.
4. This motion should be denied because this matter is set for confirmation on October 16, 2019, and my plan provides for a lump sum payment to this creditor, of \$600,000. Which is more than they allegedly received from an improper sheriff's sale. That additional sum would either benefit them or other creditors if they were limited to what they received at sale.
5. I request this motion be denied until my confirmation.
6. The movant is being less than candid with this Court and is being an obstructionist to my asserting a plan and confirming same. Specifically, they have throughout this proceeding and on this motion stated that I am in arrears on this mortgage. Yet they refuse to reinstate or modify this mortgage, alleging in filed objections and on oral argument that the property was sold. They cannot claim both positions.
7. Supplementing point no. 7 above, please note that in Court, the trustee, the movant and the Court all suggested we contact the alleged purchaser and "work out a deal". However, movants counsel refuses to give us the name of the purported purchaser as does the sheriff.
8. This motion should also be denied because of a pending adversary proceeding against this creditor movant and a possible claim against the sheriff and court for their actions in this matter.

I declare the above to be true mindful of the penalties of perjury.

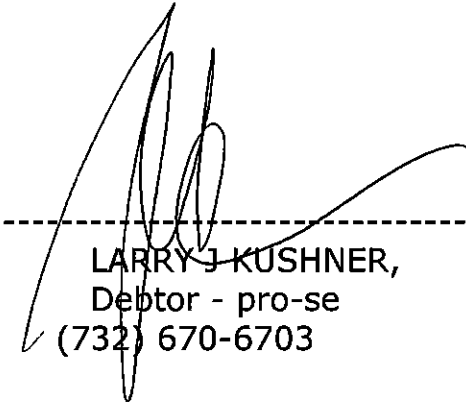
September 20, 2019

LARRY J KUSHNER,

Debtor - pro-se
(732) 670-6703

I HEREBY CERTIFY that true copy of this declaration was served by
mail on the standing Trustee, Andrew Russo, at CN 4853,
Trenton NJ 08650.

September 23, 2019



LARRY J KUSHNER,
Debtor - pro-se
(732) 670-6703